



U.S. Fish and Wildlife Service

Mr. Leos,

I have reviewed the document entitled, “Remedial Investigation and Feasibility Study Work Plan, Cedar Chemical Corporation Superfund Site.” I have the following comments.

General Comments

1. I find the general approach and sampling design adequate and appropriate; with the exception of the samples for the wooded area. See specific comments below.
2. Are the 3 ponds/basins west of Industrial Park Road still there and actively used by the current operators?

Specific Comments

1. **§5.0, Page 40:** The text indicates that wildlife exposure factors (i.e., area use factors, bioavailability, life stage, etc.) may be used in the SLERA. In order to avoid future disagreements, I suggest that these factors are agreed to *a priori* of risk calculations.
2. **Figure 6:** Please provide further support for the sampling design for the wooded area. How was it determined that 6 soil, 4 sediment, and 2 surface water samples were adequate to delineate nature and extent and subsequently exposure concentrations to receptors? Understanding surface water may be limited in availability, it's still impossible to draw statistically significant conclusions from a sample size $n = 2$.
3. **Figure 6:** Unsure of the active use of the ponds/basins, should they be sampled for surface water and sediment?

Regards,

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